# Ambient Air Monitoring

Talking Points for CAPCOA Spring Meeting, May 23, 2012

Network Plans

Talking Points:

- Recent litigation has caused EPA to closely examine evaluations of network adequacy. For 2012 network plans, Districts and ARB are still creating separate network plans, but ARB is working with EPA to compile state-wide information needed for the network adequacy determination. Changes to the structure of network plan submittals in California may need to be examined for future years.
- On May 8, Region 9 (Matt Lakin) sent memo to R9 monitoring managers outlining key regulatory requirements for network plans. While the timing does not allow all Districts to incorporate suggested revisions this year, Districts should use the memo to inform future network plans.

Other Background Info:

- Region 9 is also developing a network plan checklist, which will be shared with ARB and Districts for future plans.

Contract for California Network Plan/Assessment Development Work

Talking Points:

- Assessment process is undergoing revisions. Based on feedback from some Districts and findings from the ARB TSA, it will now be set up as a request from ARB/EPA for information on monitoring sites, with contract support for developing network assessment tools for ARB/EPA purposes. There will not be a report that judges District sites.
- Goals of the Assessment: (1) support network plan approval (e.g., identify how requirements such as co-location and minimum monitoring requirements are being met), and (2) and network assessment development (e.g., spatial relationship tools for concentration patterns and site locations).
- Steps: (1) populate a state-wide database of sites, and (2) develop network assessment tools for potential use by SLTs (e.g., in 2015 network assessments) and EPA (e.g., in reviewing site closure or relocation requests).

Other Background Info:

- We are exploring mechanisms for ARB to oversee the contract for the network plan/assessment development work, including establishing an MOU with BAAQMD (BAAQMD remains fiscal agent for contract) or transferring funds and going with ARB contract mechanisms.

TSA

Talking Points:

- Overview: The Technical System Audit (TSA) -- due for every Primary Quality Assurance Organization (PQAO) once every three years -- was a comprehensive look at ARB and District's network management, field operations, laboratory operations, quality assurance, and data management procedures

- Timing:  Draft shared with ARB and audited Districts (for factual review and edits) on May 1.  Final TSA for public release likely early fall.
- Major Findings:  substantial corrective action should be dedicated to (1) finalize PQAO structure in California, clarifying responsibilities, (2) finalize quality system documents (QAPPs) for ARB and all Districts operating within PQAO, (3) improve the consistency of network management (plans and assessments, site closures, and data certifications) across California, (4) improve quality and consistency of data validation, (5) improve consistency of field operations, and (6) improve coordination between ARB and Districts.
- *Main CAPCOA Message*:  Poor communication and lack of clarity on roles between ARB and Districts may lead to compromised data quality.  Districts must work with ARB to make sure regulatory requirements are being met.

Other Background Info:
- ARB has already put together a comprehensive plan to address corrective action for major findings, including statewide training, tools for data validation, establishing a PQAO coordinator, creating draft agreements that clarify roles and responsibilities, and taking a stronger role in assembling a single statewide network plan and assessment

PQAO
Talking Points:
- The Primary Quality Assurance Organization (PQAO) structure already exists (established in 2006).  All agencies in California except Bay Area AQMD, South Coast AQMD, and San Diego APCD, are part of the ARB PQAO.  The PQAO structure plays a fundamental role in the collection of legally and scientifically defensible data.
- Goals of R9 PQAO Implementation Strategy include:  (1) clarify roles and responsibilities for all parties involved, (2) promote consistency and efficiency within multi-jurisdictional PQAOs, and (3) ensure communication, understanding, and transparency.
- Timing of Strategy:  Presented to CAPCOA Planning Managers in mid-2011.  Shared in draft to all R9 agencies May 4, 2012.  Will likely send in final form early June.
- If Districts have comments or concerns, please send them to Matt Lakin and Meredith Kurpius by end of May.  Expectation is that Districts will be working with ARB to improve ability to meet regulatory requirements within PQAO.
- *Main CAPCOA Message*: Need to identify standard mechanism to document roles and responsibilities.

Other Background Info:
- We have received no comments from California agencies to date.  Our only formal comments received were from Pinal County, who were very supportive of the strategy and specifically suggested other mechanisms for meeting audit requirement (overcoming potential barrier of not being a 105 grantee).

Funding
Talking Points:
- Near-Roadway NO2:  EPA is proceeding with phased approach to funding the near-roadway NO2 network.  While some Districts have not received funding, regulatory

requirement for monitoring by Jan. 1, 2013 remains. EPA has announced intention to pursue rule change relaxing implementation dates, but nothing is certain. Near-road NO2 sites are intended to be platform for future multi-pollutant monitoring, so Districts should work closely with ARB and EPA on siting.

- 103 to 105: no word yet on planned changes of PM2.5 from 103 to 105; anticipate business as usual
- PAMS reinvention: likely tied to new Ozone implementation rule, which will be proposed with new Ozone NAAQS (Oct. 2013 proposal, July 2014 final)
- Overall Funding: Funding for monitoring is likely to be flat, despite new regulatory requirements. EPA is encouraging tough decisions on monitor shut-down, and is exploring flexibility in regulatory approvals (40CFR58.14). We recognize that many Districts will find it difficult or impossible to eliminate sites from their networks.

Other Background Info:
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